

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NETWORK DATA ROOMS LLC,	:	Index No. 22-CV-2299-LGS
	:	
Plaintiff,	:	NOTICE OF PLAINTIFF
	:	NETWORK DATA ROOMS LLC'S
-against-	:	MOTION FOR
	:	RECONSIDERATION OF ORDER
	:	DENYING IN PART PLAINTIFF'S
	:	MOTION FOR PRELIMINARY
	:	INJUNCTION
SAULREALISM LLC and RYAN SAUL, in her	:	
individual and professional capacities,	:	ORAL ARGUMENT REQUESTED
	:	
Defendants.	:	
_____	X	

TO:

Goldberger & Dubin, P.C.
Attn: Renee M. Wong, Esq.
Attorneys for Defendants
401 Broadway, Suite 306
New York, New York 10013
Email: renee@wonglaw.net

PLEASE TAKE NOTICE THAT, on a date to be set by the Court, the Honorable Lorna G. Schofield, United States District Judge, at the United States District Court, Southern District of New York, located at 40 Centre Street, Courtroom 1106, New York, New York 10007, Plaintiff Network Data Rooms, LLC ("NDR"), by and through its attorneys, Allyn & Fortuna LLP, will hereby move this Court, pursuant to Local Civil Rule 6.3 for an Order granting NDR's Motion for Reconsideration of the Court's Order dated September 23, 2022, denying NDR's application for a mandatory injunction, on the basis that the Court overlooked and/or misapprehend the factual record before the Court on NDR's motion in making the following findings:

1. "Mr. Patterson's review was limited to a project named "NDR-2021"

2. That there remain open questions as to (i) “[w]hether Delorge was in a position to change anything that the expert reviewed, thus affecting his conclusions”, and (ii) “whether Delorge could have deleted the code at issue and concealed the deletion.”

Pursuant to Local Civil Rule 6.3 and Judge Schofield’s Individual Rules and Procedures for Civil Cases, Part III. A. 3 (Motion Rules and Procedures), the instant motion is being made within 14 days of entry of this Court’s Order and without the filing of a pre-motion conference letter. In support of its Motion, NDR submits an accompanying Memorandum of Law.

Dated: October 5, 2022
New York, New York

ALLYN & FORTUNA LLP

By: /s/
Nicholas Fortuna
Attorneys for Plaintiff
400 Madison Avenue, Suite 10D
New York, New York 10017
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that I caused a true and correct copy of the NOTICE OF PLAINTIFF NETWORK DATA ROOMS LLC'S MOTION FOR RECONSIDERATION OF ORDER DENYING IN PART PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION, to be served via Electronic Case Filing System on October 5, 2022 upon the following counsel of record for the following parties:

Goldberger & Dubin, P.C.
Attn: Renee M. Wong, Esq.
Attorneys for Defendants
401 Broadway, Suite 306
New York, New York 10013
Email: renee@wonglaw.net

By: /s/
Nicholas Fortuna
Attorneys for Plaintiff